

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**IN RE:** § **BANKRUPTCY NO. 15-51396-cag**  
§  
**PRIMERA ENERGY, LLC** §  
§  
**DEBTOR** § **CHAPTER 11 PROCEEDING**

**APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT OF DEAN W. GREER  
AS LEGAL COUNSEL FOR THE DEBTOR IN POSSESSION**

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

NOW COMES Primera Energy, LLC (hereafter referred to as "Debtor"), Debtor herein, file this application for an order authorizing the employment of Dean W. Greer, as Counsel for Debtor in Possession. In support thereof, Debtor state as follows:

**Jurisdiction and Venue**

1 This Court has jurisdiction over the subject matter of this Motion pursuant to 28 U.S.C. §§ 157 and 1334, the Standing Order of Reference of the United States District Court for the Western District of Texas, and 11 U.S.C. §§ 327(a) and 328(a). This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A). Venue of the chapter 11 case and this Motion is proper pursuant to 28 U.S.C. § 1408.

**Factual and Procedural Background**

2 On June 3, 2015, the Debtor filed with this Court a voluntary petition under chapter 11 of title 11, United States Code (the "Code").

3 Since the bankruptcy filing, the Debtor has continued to maintain possession of its property and operate its business as debtor in possession pursuant to sections 1107 and 1108 of the Code. No request has been made for the appointment of a trustee or examiner and no official committee has yet been established in this case.

**Relief Requested**

4 Debtor wishes to employ the law firm of Dean W. Greer, 2929 Mossrock, Suite 117, San Antonio, Texas 78230, (210) 342-7100, as attorney for the Debtor in Possession. Dean W. Greer is duly admitted to practice in this Court.

5 Debtor has selected Dean W. Greer because the Debtor-in-Possession believes that each are well qualified to represent the Debtor-in-Possession in these proceedings.

**Duties to be Performed by Counsel**

6. The professional services which they are to render are the following:

(a) advising and consulting with Debtor as to its powers and duties in the continued operation of its business and management of its properties during bankruptcy;

(b) taking actions as may be necessary to preserve and protect the Debtor's assets, including, if required by the facts and circumstances, the prosecution of adversary proceedings and other actions on Debtor's behalf, the defense of actions commenced against Debtor, negotiations concerning litigation in which Debtor is involved, objection to the allowance of any objectionable claims filed against Debtor's estate and estimation of claims against the estates where appropriate;

(c) preparing, on behalf of the Debtor, necessary applications, motions, complaints, adversary proceedings, answers, orders, reports, and other pleadings and legal documents, in connection with matters affecting the Debtor and its estate;

(d) assisting Debtor in the development, negotiation and confirmation of a plan of reorganization and the preparation of a disclosure statement or statements in respect thereof; and

(e) performing other legal services that the Debtor may request in connection with this chapter 11 case and pursuant to the Bankruptcy Code.

7. To the best of the Debtor-in-Possessions' knowledge, the said DEAN W. GREER, has no connection with the Debtor, its creditors, any party in interest, its respective attorneys and accountants, the Untied States Trustee, or any person employed in the Office of the United States Trustee.

8. The Debtor-in-Possession desire to employ the said DEAN W. GREER, and its members, because of the extensive legal services required.

9. The Debtor propose to employ DEAN W. GREER, and its members, at the following hourly rates:

Dean W. Greer	\$325.00
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Legal Assistant	\$ 75.00
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Debtor understands the hourly rates and that Dean W. Greer customarily request reimbursement for all expenses actually incurred by it in connection with representation of a client in a given matter,

and will so charge in this case, subject to Court approval, including all long-distance telephone charge, mail and express mail charges, facsimile charges, delivery charges, travel expenses, computerized legal research, transcription costs, document processing, photocopying and printing charges and any extraordinary personnel expenses such as required secretarial overtime.

10 To the best of Debtor's knowledge, and except as disclosed herein and in the attached affidavit of, Dean W. Greer has not represented the creditors, equity security holders or other parties-in-interest, or their respective attorneys, in any matter relating to the Debtor or its estate. To the best of Debtor's knowledge, Dean W. Greer does not hold or represent a materially adverse interest in the Debtor's estate and is "disinterested" in Debtor as that word is defined in Section 101(14) of the Bankruptcy Code. No previous application for the relief sought herein has been made. Notice of this Application is being given to the United States Trustee.

11. The said DEAN W. GREER, represent no interest adverse to the Debtor-in-Possession or to the estate in matters upon which they are to be engaged for the Debtor-in-Possession, and their employment would be to the best interest of the estate.

**Wherefore**, Debtor respectfully request that the Court enter an order authorizing and approving the Debtor's application of the Law Office of Dean W. Greer to represent the Debtor in its Chapter 11 bankruptcy case, effective as of the Petition Date, and for such other and further relief as is just.

Respectfully submitted,

Primera Energy, Inc.

By:   
\_\_\_\_\_  
Brian K. Alfaro, Owner

Respectfully submitted,

  
Dean W. Greer  
Law Offices of Dean W. Greer  
2929 Mossrock, Suite 117  
San Antonio, Texas 78230  
Telephone (210) 342-7100  
Telecopier (210) 342-3633  
State Bar No. 08414100

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing Application for Order Authorizing the Employment of Counsel and Order, will be forwarded by First Class Mail, Postage Prepaid to each person listed below and those listed on the attached Exhibit A, when the Court approves the employment of said attorney.

PRIMERA ENERGY, LLC  
21022 GATHERING OAK #2101  
SAN ANTONIO, TEXAS 78260  
**DEBTOR**

U.S. TRUSTEE  
P. O. BOX 1539  
SAN ANTONIO, TEXAS 78295-1539  
**U.S. TRUSTEE**

  
DEAN W. GREER

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**IN RE:** § **BANKRUPTCY NO. 15-51396-cag**  
§  
**PRIMERA ENERGY, LLC** §  
§  
**DEBTOR** § **CHAPTER 11 PROCEEDING**

**DECLARATION OF PROPOSED COUNSEL FOR THE DEBTOR WITH RESPECT TO  
DISINTERESTEDNESS AND DISCLOSURE OF COMPENSATION  
UNDER 11 U.S.C. §329 AND BANKRUPTCY RULE 2016(B)**

**STATE OF TEXAS** §  
§  
**COUNTY OF BEXAR** §

I, DEAN W. GREER, am authorized to execute this Affidavit and as Affiant, hereby make solemn oath:

That I am an attorney at law, duly admitted to practice in the State of Texas and before the federal courts of this district and the Fifth Circuit Court of Appeals. Pursuant to §327(a) of the Bankruptcy Code, and Bankruptcy Rule 2014(a), I make this statement and affidavit in connection with Debtor's Motion to Employ Dean W. Greer as bankruptcy counsel. The statements contained herein are within my personal knowledge unless otherwise stated.

1       **General Statement.** Insofar as I have been able to ascertain after due diligence, the Law Offices of Dean W. Greer;

i       neither holds or represents any interest adverse to this estate or fails to be a disinterested person so as to render these offices ineligible to serve as counsel for Debtor under Section 327(a) of the Code;

ii       is not a creditor, equity security holder or insider of the Debtor and does not represent any entity (or its accountants or attorneys) other than the Debtor in connection with the Chapter 11 case;

iii      is not, and has never been, an investment banker for any outstanding security of the Debtor, nor has it been an attorney for any such institution in connection with the offer, sale or issuance of any security of the Debtor;

iv is not, and was not within the past two years, a director, officer or employer of the Debtor or of any investment banker as described above;

v has no material interest adverse to the interest of the estate of the Debtor or of any class of creditors or equity holders of the Debtor, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor or any investment banker for the Debtor.

vi has no connection with the Debtor, its creditors, any party in interest, its respective attorneys and accountants, the Untied States Trustee, or any person employed in the Office of the United States Trustee.

**2 Monies paid to Attorneys** Since Applicant was retained, the sum of \$4,000.00 was paid by the Brian K. Alfaro, individually on behalf of the Debtor. In addition, Debtor promised to pay an additional \$12,000.00 for a total retainer of \$16,000.00. Of this amount, the sum of **\$2,717,00 was used to pay for the Chapter 11 Bankruptcy filing fee and for initial work performed pre-petition and the balance has been retained in the Applicant's Trust Account.**

**3 Conclusion.** In view of the foregoing, I believe that (i) I do not hold or represent an interest adverse to the estate and (ii) am a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code as modified by Section 1107(b), and am thus fully qualified to represent the Debtor under §327 of the Bankruptcy Code. The foregoing constitutes the statement of Dean W. Greer pursuant to §327 of the Bankruptcy Code and Rule 2014(a) of the Federal Rules of Bankruptcy Procedure.

FURTHER, Deponent sayeth not.



DEAN W. GREER

SUBSCRIBED and SWORN to before me on this 10<sup>th</sup> day of June, 2015.



KATHRYN E. GROSSENBACHER  
NOTARY PUBLIC, STATE OF TEXAS



Label Matrix for local noticing

0542-5

Case 15-51396-cag

Western District of Texas

San Antonio

Fri Jun 5 09:03:45 CDT 2015

ARK-LA-TEX Wireline Services

P. O. Box 677231

1200 East Campbell #108

Richardson, TX 75081-1963

Primera Energy, LLC  
21022 Gathering Oak #2101  
San Antonio, TX 78260-3109

U.S. BANKRUPTCY COURT  
615 E. HOUSTON STREET, ROOM 597  
SAN ANTONIO, TX 78205-2055

Allied Oil & Gas  
P. O. Box 93999  
Southlake, TX 76092-0119

Andrews Pump & Supply  
P. O. Box 1378  
Andrews, TX 79714-1378

ArkLaTex Wireline Services, LLC

c/o William R. Sudela

Crady, Jewett & McCulley, LLP

2727 Allen Parkway, Suite 1700

Houston, TX 77019-2125

Attorney General of the U.S.  
10th & Const. Ave. N.W.#5111  
Washington, D.C 20530-0001

BBVA Compass  
18503 Blanco Road  
San Antonio, TX 78258-4044

Beck Bros, Inc.

P. O. Box 712

Beeville, TX 78104-0712

Beta International, Inc.  
P. O. Box 4436 msc 700  
Houston, TX 77210-4436

Black Gold Rental Tools  
P. O. Box 9531  
Corpus Christi, TX 78469-9531

Brandon Barchus

Faulk Barchus

800 Bering Drive #400

Houston, Texas 77057-2131

CC American Oilfield LLC  
P. O. Box 260012  
Corpus Christi, TX 78426-0012

CC Forbes LLC  
P. O. Box 250  
Alice, TX 78333-0250

CWFord Rentals

P. O. Box 3156

Kilgore, TX 75663-3156

Certified Oil Field Rentals, I  
P. O. Box 967  
Cuero, TX 77954-0967

Champions Contracting, LLC  
20600 H and R Road  
Houston, TX 77073-3002

Chem Rock Technologies

P. O. Box 81277

Lafayette, LA 70598-1277

Crest Pumping Technologies  
6500 West Freeway #601  
Fort Worth, TX 76116-2181

Dean W. Greer, Attorney  
2929 Mossrock, Suite 117  
San Antonio, TX 78230-5141

Diamond Energy Services

406 S. Boulder Ave #708

Tulsa, OK 74103-3862

Diversified Well Logging, LLC  
711 West 10th Street  
Reserve, LA 70084-6919

Dynasty Enterprises, Inc.  
P. O. Box 128  
Kenedy, TX 78119-0128

EVO Inc.

15720 Park Row #500

Houston, TX 77084-4961

Eagle Oilfield Inspection Serv  
P. O. Box 895  
Broussard, LA 70518-0895

Elite Toilet Rentals  
P. O. Box 3772  
Victoria, TX 77903-3772

Excalibur Rentals

P. O. Box 203047

Houston, TX 77216-3047

Express Energy Services  
P. O. Box 843971  
Dallas, TX 75284-3971

Gray Sales, Inc.  
P. O. Box 188  
Hebronville, TX 78361-0188

**EXHIBIT A**

Guadalupe Valley Electric Coop  
13849 US Hwy 87W  
La Vernia, TX 78121-5848

Hanz Hydraulics, Inc.  
6204 Fenske Lane  
Needville, TX 77461-8843

Inland Environmental & Remediation  
P. O. Box 1090  
Columbus, TX 78934-1090

(p) INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

K-3 Services  
P. O. Box 2236  
Alvin, TX 77512-2236

KDR Supply, Inc.  
P. O. Box 10130  
Liberty, TX 77575-7630

Karnes County National Bank  
P. O. Box 98  
Karnes City, TX 78118-0098

Key Energy Services  
P. O. Box 4649  
Houston, TX 77210-4649

Lone Star Industries  
P. O. Box 188  
Hebronville, TX 78361-0188

MMZ Consulting  
9207 Limestone Pass  
Boerne, TX 78006-6549

MW Rentals & Service  
4002 U.S. Hwy 59 North  
Victoria, TX 77905-5501

Maverick Field Services  
P. O. Box 262  
La Grange, TX 78945-0262

McGuire Industries  
2416 W. 42nd Street  
Odessa, TX 79764-6309

Midstar Energy LP  
1840 Snake River Road #E  
Katy, TX 77449-7755

National Oilwell Varco LP  
P. O. Box 203793  
Dallas, TX 75320-3793

Nationwide Capital Funding  
P. O. Box 260775  
Corpus Christi, TX 78426-0775

Newpark Drilling Tools  
21920 Merchant's Way  
Katy, TX 77449-6834

Oil Patch Rental Services  
P. O. Box 204667  
Dallas, TX 75320-4667

P & A Supply  
P. O. Box 4814  
Victoria, TX 77903-4814

Platinum Pressure Pumping  
2100 W. Loop S #1400  
Houston, TX 77027-3525

Production Equipment Company  
P. O. Box 2621  
Corpus Christi, Texas 78403-2621

Quick Pipe  
1825 Upland Drive  
Houston, TX 77043-3003

Rathole Drilling, Inc.  
P. O. Box 389  
Alice, TX 78333-0389

Refinery Specialties  
P. O. Box 577  
Hempstead, TX 77445-0577

Steve Kent Trucking  
P. O. Box 148  
Lottie, LA 70756-0148

Trican Well Services  
P. O. Box 677418  
Dallas, TX 75267-7418

U. S. Attorney/IRS  
601 N. W. Loop 410, Suite 600  
San Antonio, Texas 78216-5512

U. S. Trustee  
615 E. Houston St. Room 533  
San Antonio, Texas 78205-2055

Unit Texas Drilling, LLC  
7130 South Lewis #1000  
Tulsa, OK 74136-5465

United States Trustee - SA12  
US Trustee's Office  
615 E Houston, Suite 533  
PO Box 1539  
San Antonio, TX 78295-1539

c/o David S. Gragg / Natalie F. Wilson  
Langley & Banack, Inc.  
745 E. Mulberry, Suite 900  
San Antonio, TX 78212-3141

Dean William Greer  
2929 Mossrock, Suite 117  
San Antonio, TX 78230-5141

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Internal Revenue Service  
P. O. Box 21126  
Philadelphia, PA 19114

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d) Primera Energy, LLC 21022 Gathering Oak #2101 San Antonio, TX 78260-3109	End of Label Matrix
	Mailable recipients 61
	Bypassed recipients 1
	Total 62